



**Testimony to Natural Resources Board of Wisconsin  
October 28, 2020  
8:30 AM**

My name is Cheryl Nenn. On behalf of Milwaukee Riverkeeper, we support the rules as drafted to create NR159 related to banning firefighting foams that contain PFAS, except for in cases of emergency and for testing (responsive to Emergency Board Order WA-06-20(E)).

Banning these fluorinated firefighting foams is the LEAST thing that we can do to STOP or minimize new sources of PFAS chemicals that pose a threat to our communities. A survey in March of fire departments from WDNR found that 77% of respondents had purchased, stored, trained with or used fluorinated foam at some point in the past, mostly for emergency fires involving flammable liquids or gas.

We know these foams are being used and that they are also a major source of contamination to our waters statewide and in Milwaukee

Firefighting foams from Mitchell Airport as well as from training at adjacent US National Guard facilities are THE major source of PFAS contamination to local groundwater, stormwater and to the Kinnickinnic River. In fact, groundwater contamination levels at Mitchell are extreme. The highest PFOS+PFOA combined level measured was 33,046 ppt in 2019, well above the proposed DHS standard of 20 ppt. The highest level of PFHxS (Perfluorohexanesulfonate) in groundwater was 135,000 ppt in 2019.

Recent studies at 14 sites within the Milwaukee River Estuary Area of Concern, which we are hoping to clean up in the next few years of industrial contaminants like PCBs, found PFAS in 100% of all water samples (specifically, PFBA or perflourobutanoate). Not surprisingly, the highest concentrations of PFAS chemicals were found in sediment and surface water from the Kinnickinnic River –

specifically PFHxS was found at 44.4 parts per trillion (ppt) in surface water and PFOS at 9.1 parts per billion (ppb) in sediment.

Why should we care? The KK River drains to Lake Michigan, which is the source of drinking water for over 1 million people in the Greater Milwaukee Area. PFAS contamination from firefighting foams poses a real threat to our drinking water supply. We are lucky no one is drinking local groundwater.

We also know PFAS has been found in fish from past DNR studies, and this poses a threat to our fisherpeople, esp. those that are subsistence fishing. We are waiting for results for 2019 and 2020 fish sampling with dread that we are going to have to tell our community not to eat any fish after so much forward progress has been made in cleaning up our rivers over the last several decades.

We CAN'T let industry pressure stop forward progress on dealing with these forever chemicals that pose a significant risk to our human health and environment. We are FAR behind other neighboring states in dealing with these issues.

We must EXPEDITE common sense measures like banning fluorinated firefighting foams, except for cases of emergency where other foams do not work. We support inclusion of Table 1 to protect our community. As written, these are not enforceable standards but rather performance standards that help ensure that treatment technologies being developed are efficient and work as intended. Also, emergency spill notification should be maintained to protect communities, surface waters, and drinking water supplies.

Thank you for your consideration of these comments.